# **RESPONSE**

### Claims Status

Claims 1-32 were originally filed in this application. An Office Action was issued on April 7, 2006, rejecting claims 1-32 as allegedly unpatentably obvious over U.S. Patent No. 6,201,962 to Sturniolo et al. ("Sturniolo") and in view of U.S. Patent Publication No. 2002/0056008 to Keane ("Keane"). In response, Applicants filed an Amendment and Response on July 20, 2006 in which claims 1-17 were cancelled, claims 18, 25 and 32 were amended, and claims 33 and 34 were added. A Final Office Action issued on October 18, 2006, rejecting claims 18-34 as allegedly anticipated by U.S. Patent No. 7,079,499 to Akhtar et al. ("Akhtar"). In this Amendment and Response, Applicants have amended claims 18, 25 and 32. Support for these amendments can be found throughout the originally filed claims and specification, and at least at paragraphs [0025] and [0144] of the application as published as U.S. Patent Application Publication No. 2002/0136226. No new matter has been added.

Applicants respectfully submit that the claims as now presented are patentable over the cited reference.

#### Akhtar

Akhtar is generally directed to a "mobility manager framework" facilitating nomadic roaming of mobile nodes (e.g., cell phones) among wireline networks and wireless networks using a "secure messaging gateway" and protocol interfaces that manage communication among the networks. Col. 29, line 65, and col. 30, line 45. To allow communication among these heterogeneous networks, however, Akhtar's approach requires "several interfaces" that are needed to "seamlessly integrate different access networks." Col. 30, line 46. More specifically, Akhtar lists four separate protocols, namely, Mobile Node to Local Service Function, LAN/WAN to Local Service Function, Local Service Function to Network Service Function and Local Service Function to Local Service Function, at least one of which must be added to the standard internet protocol to facilitate interoperability. Col. 30, line 51 – col. 31, line 18.

### Independent Claims 18, 25 and 32

Independent claims 18, 25 and 32 each recite, in part, "enabling a mobile device to roam between a first wireless network and a second wireless network," wherein "the first network is substantially heterogeneous with the second network." Specifically, a request is received "at the first wireless network to access a second wireless network," and "through an intermediary network via the first network" an access identifier is obtained for the mobile device to use when accessing the second network. By obtaining this access identifier, the first network can "provide a virtual representation of the first wireless network at the second wireless network by emulating a gateway of the first network by supporting protocols of the first wireless network at the second wireless network" and therefore allow "the mobile device to seamlessly access the second wireless network via the first wireless network using the access identifier."

As described above, Akhtar uses intermediate protocols to allow devices to roam from one type of network to another. These intermediate protocols translate from the protocols of one network to the protocols of the other. In contrast, Applicants claims recite a mobile device accessing substantially heterogeneous networks (e.g., seamlessly transitioning from a wireless cellular network using GPRS to a wireless IP-based network, for example), and doing so in a manner that does not require such intermediate protocols. Specifically, the provision "via the first wireless network [of] the access identifier to the mobile device to use when accessing the second wireless network" allows the second wireless network to emulate a gateway in the first wireless network, and create "virtual representation of the first wireless network at the second wireless network" by "supporting protocols of the first wireless network at the second wireless network." As a result, the mobile device is able "to seamlessly access the second wireless network via the first wireless network using the access identifier."

By supporting protocols of the first wireless network at the second wireless network, the second network can, without the need for intermediate protocols or other additional components, emulate a gateway in the first wireless networkin the second network. This is a different approach, which eliminates additional costs, complexity and management issues associated with a solution requiring addition protocols or conversions as described by Akhtar.

# **CONCLUSION**

Applicants respectfully request that the Examiner reconsider the application and claims in light of this Amendment and Response, and respectfully submit that the claims are in condition for allowance. If the Examiner believes a telephonic interview would expedite the favorable prosecution of the present application, the Applicants' attorney would welcome the opportunity to discuss any outstanding issues, and to work with the Examiner toward placing the application in condition for allowance.

Respectfully submitted,

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